

***IN THE DISTRICT COURT OF THE UNITED STATES***

***for the Western District of New York***

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**NOVEMBER 2017 GRAND JURY  
(Impaneled 11/03/2017)**

**THE UNITED STATES OF AMERICA**

**INDICTMENT**

**-vs-**

**JAMES A. CHAPMAN  
a/k/a Fatz Guy  
a/k/a Perverted Doe**

**Violations:**

Title 18, United States Code,  
Sections 1001(a)(2), 1591(a)(1),  
2251(a), 2252A(a)(2), 2252A(a)(5)(B),  
and 2422(b)  
(14 Counts and Forfeiture Allegation)

**COUNT 1  
(Enticement of a Minor)**

**The Grand Jury Charges That:**

From on or about November 24, 2014, to on or about November 25, 2014, in the Western District of New York, and elsewhere, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, using any facility and means of interstate and foreign commerce, that is, a cellular telephone and the internet, did knowingly persuade, induce, entice, and coerce, and attempt to persuade, induce, entice, and coerce Victim 1, a person known to the Grand Jury, an individual who had not attained the age of 18 years, to engage in prostitution and sexual activity for which any person can be charged with a criminal offense.

**All in violation of Title 18, United States Code, Section 2422(b).**

**COUNT 2**  
**(Sex Trafficking of a Minor)**

**The Grand Jury Further Charges That:**

Between on or about November 24, 2014, and on or about November 25, 2014, in the Western District of New York, and elsewhere, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, Victim 1 and Victim 2, persons known to the Grand Jury, and persons who had not attained the age of 18 years, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe Victim 1 and Victim 2, that Victim 1 and Victim 2 had not attained the age of 18 years and that Victim 1 and Victim 2 would be caused to engage in a commercial sex act.

**All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), and 1591(c).**

**COUNT 3**  
**(Production of Child Pornography)**

**The Grand Jury Further Charges That:**

Between on or about November 24, 2014, and on or about November 25, 2014, in the Western District of New York, and elsewhere, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly employ, use, persuade, induce, entice, and coerce, and attempt to employ, use, persuade, induce, entice, and coerce any minor, that is, Victim 1 and Victim 2, persons known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having

reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; knowing and having reason to know that such visual depiction would be transported and transmitted in and affecting interstate and foreign commerce; and which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce; and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce.

**All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).**

**COUNT 4**  
**(Distribution of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about December 14, 2016, in the Western District of New York, and elsewhere, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image of Victim 1 and Victim 2, persons known to the Grand Jury, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and 2252A(b).**

**COUNT 5**  
**(Distribution of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about January 6, 2017, in the Western District of New York, and elsewhere, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image of Victim 1 and Victim 2, persons known to the Grand Jury, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and 2252A(b).**

**COUNT 6**  
**(Distribution of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about April 7, 2017, in the Western District of New York, and elsewhere, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image of Victim 1 and Victim 2, persons known to the Grand Jury, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and 2252A(b).**

**COUNT 7**  
**(False Statement)**

**The Grand Jury Further Charges That:**

On or about January 24, 2018, in the Western District of New York, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, in a matter within the jurisdiction of the executive branch of the Government of the United States, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation, that is, the defendant did state and represent to a Special Agent of the Federal Bureau of Investigation that, at the time he had sex with Victim 1 and Victim 2, persons known to the Grand Jury, he believed Victim 1 and Victim 2 were 18 years old, when in truth and in fact, as the defendant then and there knew, the defendant knew that Victim 1 and Victim 2 were younger than 18 years of age at the time he had sex with them.

**All in violation of Title 18, United States Code, Section 1001(a)(2).**

**COUNT 8**  
**(Possession of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about January 24, 2018, in the Western District of New York, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly possess material, that is, a LG cellular telephone, Model LG-SP320, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce; that

had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).**

**COUNT 9**  
**(Possession of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about August 9, 2017, in the Western District of New York, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly possess material, that is, a Facebook account in the name “Fatz Guy,” that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).**

**COUNT 10**  
**(Possession of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about August 9, 2017, in the Western District of New York, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly possess

material, that is, a Facebook account in the name “James Chapman,” that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).**

**COUNT 11**  
**(Production of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about April 7, 2017, in the Western District of New York, and elsewhere, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly employ, use, persuade, induce, entice, and coerce a minor, that is, Victim 3, a person known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; knowing and having reason to know that such visual depiction would be transported and transmitted in and affecting interstate and foreign commerce; and which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; which visual depiction was actually transported and transmitted using any means

and facility of interstate and foreign commerce; and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce.

**All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).**

**COUNT 12**  
**(Receipt of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about April 7, 2017, in the Western District of New York, and elsewhere, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image of Victim 3, a person known to the Grand Jury, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).**

**COUNT 13**  
**(Distribution of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about April 16, 2017, in the Western District of New York, and elsewhere, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that is, an image of Victim 3, a person known to the Grand Jury, that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had



been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).**

**COUNT 14**  
**(Possession of Child Pornography)**

**The Grand Jury Further Charges That:**

On or about August 9, 2017, in the Western District of New York, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, did knowingly possess material, that is, a Facebook account in the name “Perverted Doe,” that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).**

**FORFEITURE ALLEGATION**

**The Grand Jury Alleges That:**

As a result of the offenses alleged in this Indictment, the defendant, JAMES A. CHAPMAN a/k/a Fatz Guy a/k/a Perverted Doe, shall forfeit to the United States any matter which contains any visual depiction of child pornography, which was produced, transported, mailed, shipped, or received and/or any and all property, real and personal, used

or intended to be used to commit or to promote the commission of such offenses, and all property traceable to such property, including but not limited to the following:

- 1) One (1) LG cellular telephone, model LG-SP320, serial number 089772186401733, utilizing telephone number (716) 708-2327.

**All pursuant to Title 18, United States Code, Sections 2253(a)(1) and 2253(a)(3).**

DATED: Buffalo, New York, March 7, 2018.

JAMES P. KENNEDY, JR.  
United States Attorney

BY: S/AARON J. MANGO  
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A TRUE BILL:

S/FOREPERSON